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*PARALEGAL*  
Maria Nunez, B.S.

January 20, 2021

1/21/2021

The requested extensions are  
granted. The schedule is  
adopted. SO ORDERED.



**Via ECF Only**

Honorable Paul Crotty  
United State District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: United States of America v. Zhen, et. al.  
Case No.: 20-CR-56(PAC)

Your Honor:

This office represents Edward Hernandez, the defendant in the above referenced matter which is pending before the Court. I write on behalf of my client, as well as counsel for the three other defendants, to respectfully request that the Court **extend the schedule to file defense motions until February 18, 2021 and to March 4, 2021 for the Government's response.** **All** defense counsel and counsel for the Government, have **conferred and agree to the proposed extended schedule.** We request this extension so that the Government and defendants can continue plea discussions.

Counsel further agrees and requests that time, pursuant to the Speedy Trial Act, be excluded until the adjourned conference date set by the Court.

The Courts consideration of this request is respectfully appreciated. Thank you.

Yours truly,

*John Russo*

John L. Russo(JR6200)

Cc: AUSA Aline Flodr (via ECF)  
All Defense Counsel (via ECF)

